

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

LA 'TILA D. ABBOT,
Plaintiff,

Vs.
MARKET STAR, Phillippe Aquilina
MARKETING WERKS, Cynthia Snoot
ROSALIN H. HALL-SMITH, EEOC

Case No.

3:13CV143

Jury trial Requested

Defendants, COMPLAINT

PETITION FOR DAMAGES FOR SEXUAL RACIAL HARASSMENT

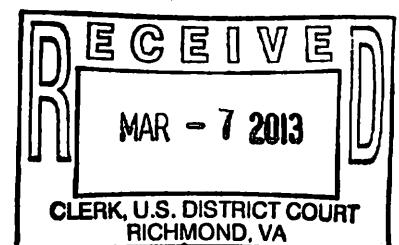
Comes now plaintiff La 'tila D. Abbott, to petition this court to direct respondents to compensate plaintiff for damages for racial harassment, retaliation and sexual harassment.

Respondents MARKET STAR and MARKETING WERKS has allowed the work place to operate under sexual and racial tension by allowing its employees and associated third parties to make sexual and racially charged statements without taking any corrective measures. According to MARKET STAR work records, while the plaintiff was in her full time status, the plaintiff has out performed all other employees. The plaintiff was subjected to watermelon jokes, crack hoes and bimbo statements. Said statements were made directly toward me in the presence of supervisors, who took no action after I made a complaint.

My employer retaliated against me by not allowing me to go back to work full time when I needed to. I worked part time because me and my family were about to relocate. However my situation changed and I needed to go back to work full time. My employer has since hired 2 other employees since my request to go back to work full time. MARKET STAR has demonstrated retaliation by not accepting my application to return to full time status.

Employee Cameron, John Doe, made comments about crack hoes in Harlem, NY while in front of the regional director, Jon Solovey who took no action to correct Mr. Cameron actions. I was subjected to watermelon jokes at the MARKETING WERKS work site and complained to MARKET STAR who took no action.

Respondent Rosalind H. Hall-Smith, tried to discourage me from filing my claim when she told me that MARKET STAR did follow the procedures of EEOC and provided classes for its employees for sexual and racial sensitivity. Ms. Hall-Smith stated to me that I could not file a claim against

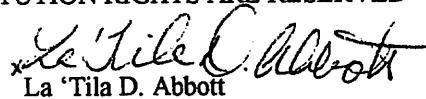


MARKETING WERKS because they are a third party. However her statements are contrary to Title VII of the Civil Rights Act of 1964. I asked Ms. Hall-Smith to provide that statement in writing and she wouldn't do it.

I petition this court to direct the respondents to produce records showing employees did sign in for said classes, provide the names of the course instructors, provide a copy of the course prospectus and provide me with a copy of my signature for said course.

Plaintiff Abbott, has suffered emotionally, physically and financially through out this ordeal. I'm very uncomfortable at work knowing that the racial harassment will be tolerated at work and not corrected. I have suffered physically because my hair has fell out. I don't receive my commission pay and that's causing problems in me paying my bills on time and taking care of car repairs.

ALL CONSTITUTION RIGHTS ARE RESERVED


La Tila D. Abbott

P.O. Box 50364
Richmond VA 23250

STATEMENT OF CLAIMS UNDER 12 (b) (6)

Under Title VII, plaintiff is entitled to bring a claim. Respondents have not demonstrated with documents to the plaintiff that sensitivity classes were giving. According to documents e-mailed to respondent MARKET STAR H.R. office, they have taken no action to correct this problem. MARKETING WERKS had a federal obligation to safe guard third parties against racial harassment. Respondent Hall-Smith had a duty to receive proof that MARKET STAR and MARKETING WERKS did follow the law in making sure that classes against sexual and racial harassment was provided. See Dismissal and Notice of Rights. MARKET STAR acknowledged their wrong doings by offering me \$192.00 for a settlement according to the offer that was submitted to EEOC representative Hall-Smith.

RESPONDENT	COMPENSATORY	PUNITIVE	LEGAL FEES
MARKET STAR	\$100,000.00	\$300,000.00	\$30,000.00
MAR. WERKS	\$100,000.00	\$300,000.00	\$30,000.00
R. H. HALL-SMITH	\$100,000.00	\$300,000.00	\$30,000.00

DEMAND FOR JURY TRIAL

I, La 'Tila D. Abbott, do exercise my U.S. Constitutional right under the Seventh Amendment to have a jury trial.

ALL CONSTITUTIONAL RIGHTS ARE RESERVED.


La 'Tila Abbott

STATEMENT OF AFFIRMATION

I, La 'Tila D. Abbott, do affirm that all the statements herein are true and correct to the best of my knowledge.

CERTIFICATE OF SERVICE

I, La 'Tila D. Abbott, certify that a copy of the following was mailed to:

Michael Blue
Attorney at law
RAY QUINNEY & NEBEKER
P.O. Box 45385
Salt Lake City, UT 84145

ROSALIND H. HALL-SMITH
830 EAST MAIN STREET SUITE 600
RICHMOND, VA 23219

ALL CONSTITUTIONAL RIGHTS ARE RESERVED


La 'Tila D. Abbott

Feb. 5, 2013

Market Star and Phillippe Aquilina Serve:

Michael Blue

Attorney at Law

Ray Quinney & Nebeker

P.O. Box 45385

Salt Lake City UT 84145

3:13CV143

EEOC: and Rosalin H. Hall-Smith Serve:

Rosalin H. Hall-Smith

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